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(not for service)

January 28, 2021

**BY ECF**

Hon. Barbara C. Moses  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: *S.B. et al. v. New York City Dep't of Education*,  
20-CV-08095 (ALC)(BCM)

Dear Judge Moses:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel assigned to represent the New York City Department of Education ("DOE") in the above-referenced matter. I submit this letter after consultation with Plaintiffs' counsel, Adam Dayan, Esq., in accordance with Your Honor's Individual Rules of Practice § 2(a) to respectfully request to adjourn the Initial Conference currently scheduled February 4, 2021 *sine die*.<sup>1</sup>

Separately, the parties seek leave to file a status report within 30 days informing the Court of the status of negotiations and whether the parties seek a settlement conference or status conference to determine a briefing schedule. The additional time requested will allow defense counsel to review Plaintiffs' counsel attorney timesheets, request appropriate authority, and make a reasonable settlement offer. To the extent the parties reach a settlement agreement prior to the conference, the parties will promptly file a letter notifying Your Honor.

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<sup>1</sup>In compliance with Your Honor Individual Rules of Practice, while the parties seek to adjourn the conference *sine die* both parties are available to appear for a subsequent conference on March 8, 2021, March 9, 2021, or a date as soon thereafter is convenient for Your Honor.

This is the first request for an adjournment of the initial conference. Adam Dayan, Esq., counsel for Plaintiffs, consents to the proposed adjournment of the initial conference. Lastly, the proposed adjournment does not affect any currently scheduled events in the action.

Thank you for your consideration of this request.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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Thais R. Ridgeway  
Assistant Corporation Counsel

CC: **BY ECF**  
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Application GRANTED. The initial conference currently scheduled for February 4, 2021 at 11:00 a.m. is hereby ADJOURNED SINE DIE. The parties shall file a joint status report no later than **March 1, 2021**, updating the Court on the status of their settlement negotiations. SO ORDERED.



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Barbara Moses, U.S.M.J.  
January 29, 2021